

James Pittard
3205 Fiji Lane
Alameda, CA 94501

August 17, 1999

Docket Management Branch, HFA 305
Food and Drug Administration
5630 Fishers Lane - Rm. 106
Rockville, MD 20852

7180 '99 AUG 24 10:10
Re: Dockets 98N-1230
96P-0418
97P-0197

I am writing in reference to the above dockets which I understand are under consideration on the subject of the use of artificial molting in egg production. I describe it as "artificial" as opposed to the natural course of events.

Obviously, it is a practice which is used to increase egg production. But it is also just one more instance of an industry that benefits from more than one cruel procedure. I assume you are aware of the debeaking, the narrow cages and the feeding of products whose source could turn the stomach of anyone privy to the ingredients. It is to this particular a abomination that I ask for your attention.

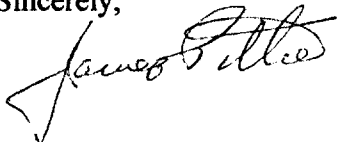
As you know, Salmonella enteritidis is showing up in eggs and the primary egg pathogen is transmitted directly from a hen to her egg. In the words of the FDA itself, "the ideal solution to this public health problem would be to adopt measures to eliminate viable Se in shell eggs." We can all say "Amen" to that but the question becomes, "What Measures." One that immediately steps forward is the forced molting of the chickens which results in such stress it weaken the hens immune system so badly she becomes prone to disease and salmonella infections.

Forced molting is an inhumane process. The frightened birds are deprived of food for up to two weeks, water is restricted for up to eight weeks and they are kept in pitch dark for weeks on end. The result is that hundreds of them die while those who survive grow weak, shed all their feathers and lose up to 35% of their body weight. And all of this cruelty throws the hens' systems into collapse, stressing and shocking their worn-out bodies into laying one more batch of eggs before being sent to slaughter.

Is it any wonder that salmonella is so prevalent among chicken eggs and carcasses. It has been stated that unmolted hens usually have to ingest about 50,000 Salmonella cells to become infected. Molted hens need fewer than ten to become infected. The result is sick birds and contaminated eggs.

Warning labels and refrigeration are not enough. If the public is to be properly protected, the problem must be addressed at the source which is the egg farms that are forcing molting to make a few extra dollars. Public safety should come before greed and forced molting should be prohibited by law.

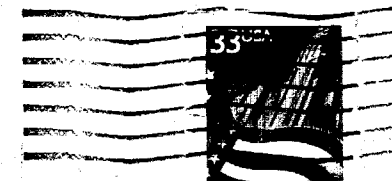
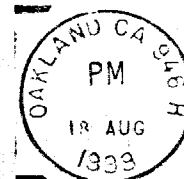
Sincerely,



96P-0418

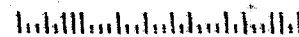
C 346

James Pittard
3205 Fiji Lane
Alameda, CA 94501



Docket Management Branch, HFA 305
Food and Drug Administration
5630 Fishers Land Rm. 106
Rockville, MD 20852

20857/0001



CROSS FILE SHEET

File Number:

98N-1230/ C346

See File Number:

97P-0197/ C347

96P-0418/ C346